

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :
 :
 v. : **NO. 04 - _____**
 :
 DENNIS JARDINE : **VIOLATIONS: 18 U.S.C. §§ 371 and 2;
49 U.S.C. §§ 32705(a) and 32709(b)**

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

1. At times relevant and material to this Information, defendant DENNIS JARDINE was engaged in the buying and selling of used motor vehicles. Defendant DENNIS JARDINE operated under the names Bridgewater Rental & Leasing, Whitehouse Rental & Leasing, and Hunterdon Leasing, among others.

2. As used in this Information, the following vehicle numbers refer to the vehicles identified below:

<u>Vehicle No.</u>	<u>Year/Make</u>	<u>Vehicle Identification Number</u>
1	1994 Pontiac	1G2WJ12M4RF345592
2	1995 Pontiac	1G2HX52K0S4287446

THE CONSPIRACY

3. Beginning at least as early as July 1997, and continuing through at least January 2000, in the Eastern District of Pennsylvania and elsewhere, DENNIS JARDINE, defendant

herein, did knowingly and intentionally combine, conspire, confederate, and agree with Bruce Jardine, Robert Jardin, and Dean Jardine, and with other persons, to commit offenses against the United States, that is:

a. knowingly to reset and alter, and cause to be reset and altered, the odometers of motor vehicles, intending to change the mileage registered by the odometers, in violation of Title 49, United States Code, Sections 32703(2) and 32709(b);

b. to transport and cause to be transported in interstate commerce, with unlawful and fraudulent intent, falsely made, forged, altered, and counterfeited securities -- namely, motor vehicle certificates of title -- knowing the same to be falsely made, forged, altered, and counterfeited, in violation of Title 18, United States Code, Section 2314; and

c. knowingly to give and cause to be given, in making the written disclosures to the buyers of used motor vehicles required by Title 49, United States Code, Section 32705(a), and Title 49, Code of Federal Regulations, Part 580, false statements relating to the actual mileage of the vehicles, in violation of Title 49, United States Code, Sections 32705(a) and 32709(b).

PURPOSE OF THE CONSPIRACY

4. It was the purpose of the conspiracy to cause both the immediate and subsequent buyers of used motor vehicles, including ultimate consumers, to pay more for the vehicles than they would have paid if they had known the vehicles' correct mileage readings.

MANNER AND MEANS BY WHICH THE CONSPIRACY OPERATED

5. It was a part of the conspiracy that the defendant, along with his co-conspirators, purchased at least 39 used motor vehicles, caused the odometers of those vehicles to be rolled back to lower mileage figures, made fraudulent alterations to the titles, and resold the vehicles to purchasers in the Eastern District of Pennsylvania and elsewhere, representing to the purchasers that the false low-mileage readings were the vehicles' correct mileage readings.

6. It was further part of the conspiracy that the defendant purchased high-mileage used motor vehicles for resale using various business names, both real and fictitious, from private parties, automobile dealers and automobile auctions in New Jersey and elsewhere.

7. It was further part of the conspiracy that after purchasing those vehicles, the defendant caused the vehicles' odometers to be rolled back to lower mileage figures (vehicles with such altered odometers are called "rolled-back vehicles" below).

8. It was further part of the conspiracy that the defendant caused automobile titles and other motor vehicle title and ownership documents to be physically altered so that the mileage figures on those documents corresponded to the false low mileage odometer readings on the rolled-back vehicles.

9. It was further part of the conspiracy that the defendant caused falsely made, forged, altered and counterfeited titles and vehicle reassignment documents to be transported in interstate commerce to and within the Eastern District of Pennsylvania and elsewhere, for use in sales of those motor vehicles.

10. It was further part of the conspiracy that the defendant and his co-conspirators sold, and caused to be sold, the rolled-back vehicles to purchasers in Pennsylvania, and elsewhere, using the business names Bridgewater Rental & Leasing and Whitehouse Rental & Leasing, among others.

11. It was further part of the conspiracy that in connection with the sale of the rolled-back vehicles, the defendant and his co-conspirators provided false low-mileage odometer disclosure statements to subsequent purchasers and to the motor vehicles division of the New Jersey Department of Transportation.

12. It was further part of the conspiracy that the co-conspirators' actions and misrepresentations led the defendant to receive higher prices for the vehicles sold than he would have received if the vehicles had correct mileage readings, and that buyers of the vehicles, including ultimate consumers, paid more for the vehicles than they would have paid if they had known the vehicles' true mileage.

OVERT ACTS

13. In order to effect and accomplish the objects and purposes of the conspiracy, DENNIS JARDINE and his co-conspirators did commit numerous overt acts, in the Eastern District of Pennsylvania and elsewhere, among which were the following:

Vehicle No. 1

- a. On or before November 10, 1999, defendant DENNIS JARDINE purchased Vehicle No. 1 with at least 74,661 miles on the odometer.
- b. On or about November 10, 1999, defendant DENNIS JARDINE obtained a new title for Vehicle No. 1 by submitting to the State of New Jersey a title application falsely certifying that Vehicle No. 1 had 45,665 miles.
- c. On or about November 12, 1999, defendant DENNIS JARDINE caused to be transported in interstate commerce, from New Jersey to Pennsylvania, the title he obtained for Vehicle No. 1 containing a mileage certification he knew to be false.
- d. On or about November 12, 1999, in connection with the sale of Vehicle No. 1 at Manheim Auto Auction in Manheim, Pennsylvania, defendant DENNIS JARDINE caused to be signed an odometer statement falsely certifying that Vehicle No. 1 had only 45,789 miles.
- e. On or about November 15, 1999, defendant DENNIS JARDINE deposited a check for \$5,275 issued by Manheim Auto Auction as payment for the sale of Vehicle No. 1 into a bank account bearing the name Whitehouse Rental & Leasing and controlled by the defendant.

Vehicle No. 2

- f. On or before April 15, 1999, defendant DENNIS JARDINE purchased Vehicle No. 2 with at least 113,467 miles on the odometer.
- g. On or about April 15, 1999, defendant DENNIS JARDINE obtained a new title for Vehicle No. 2 by submitting to the State of New Jersey a title application falsely certifying that Vehicle No. 2 had 34,225 miles.

h. On or about April 16, 1999, defendant DENNIS JARDINE caused to be transported in interstate commerce, from New Jersey to Pennsylvania, the title he obtained for Vehicle No. 2 containing a mileage certification he knew to be false.

i. On or about April 16, 1999, in connection with the sale of Vehicle No. 2 at Manheim Auto Auction in Manheim, Pennsylvania, defendant DENNIS JARDINE caused to be signed an odometer statement falsely certifying that Vehicle No. 2 had only 34,608 miles.

j. On or about April 19, 1999, defendant DENNIS JARDINE deposited a check for \$9,680 issued by Manheim Auto Auction as payment for the sale of Vehicle No. 2 into a bank account bearing the name Whitehouse Rental & Leasing and controlled by the defendant.

In violation of Title 18, United States Code, Section 371.

COUNTS TWO AND THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

14. Paragraphs 1 and 2 of Count One are realleged and incorporated herein by reference.

15. On or about the dates listed below, in the Eastern District of Pennsylvania, and elsewhere, DENNIS JARDINE, defendant herein, did knowingly and willfully give and cause to be given, in making the written disclosures to the buyers of used motor vehicles required by Title 49, United States Code, Section 32705(a), and Title 49, Code of Federal Regulations, Part 580, false statements relating to the cumulative mileage registered on the odometers of the motor vehicles listed below, in that the defendant certified as accurate the false mileages listed below, when in fact the odometers of the vehicles had registered the high mileages listed below when the defendant acquired the vehicles, each such instance being a separate and additional Count of this Information:

<u>Count</u>	<u>Vehicle No.</u>	<u>Date</u>	<u>High Mileage</u>	<u>False Mileage</u>
2	1	November 12, 1999	74,661	45,789
3	2	April 16, 1999	113,467	34,608

In violation of Title 49, United States Code, Sections 32705(a) and 32709(b), and Title 18, United States Code, Section 2.

PATRICK L. MEEHAN
United States Attorney